

I am Mr. Brian Ferrill. First off to give some ideas of effectiveness of your notices, I'm from Everett, Washington and I drove over here specifically to attend this – this public hearing. I'm with a small company called "Pull-A-Part" that I am also a representative of ARO – Automotive Recycler of Washington and we do feel that it's vital that we get some of our concerns and comments made and known to the Department of Ecology. And one of the first ones that I would like to bring up is the definition of receiving waters and how are we going to ID the receiving waters when my stormwater runs off into a ditch? Do I track the ditch to the nearest stream? Then do I track the stream to nearest river that has a name? So that I can ID it. Or, do I just put on my permit that my stormwater discharges to the ditch. That's a concern. Also of concern to us is that in our industry the majority of auto recyclers buy their cars at auction, that are open to the public. Everybody thinks that auto recyclers buy the majority of the wreck cars. We don't. The general public buys sixty to seventy percent of these cars at auction. Whereas your licensed auto wreckers buy the rest. Now we are competing against the general public and they don't have to comply with these rules and regulations like we do. Then you have another concern is if I am at a auction, and it starts to rain, then I haven't been able to get my sample in, then it means that I've got to leave this auction when competing against the general public to buy my vehicles to properly recycle and they are buying my cars or they don't have to recycle like I do. They don't fall under the same regulations that I do, so I drive all the way back to my place of business only to find out that it didn't rain the proper amount, I didn't get a tenth of inch, so I lost an opportunity to buy stock for my business, I lose out to my competitors to comply. Another concern is if I do – if it does – is a qualifying storm event and it does start raining and I do get the tenth of inch, being able to get to my facility within the timeframe that specified in the permit. I do believe the curb permit specifies that you have to – have to take the sample within half of hour of qualifying storm event. How strictly is that going to be enforced? You know, if it starts to rain at 2:00 a.m. in the morning am I suppose to get up and go so that I can make it within the timeframe? Another concern is that complying with the state regulations should be a competitive advantage not a disadvantage. An currently it feels like being in compliance is disadvantage, I do understand that its not the Department of Ecology's fault, but there is so many illegal auto recyclers out there, but it does put me in a competitive disadvantage having to comply. Thank you.